

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

SEP 14 2022

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACOBY WATTS

Defendant.

4:22CR508 RLW/PLC

MOTION FOR PRETRIAL DETENTION AND HEARING

The United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Cassandra J. Wiemken, Assistant United States Attorney for said District, moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with one count of carjacking and one count of brandishing a firearm in furtherance of a crime of violence.
2. The rebuttable presumption of detention applies to Defendant. Title 18, United States Code, Section 3142(e)(3)(B).
3. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against Defendant, the Defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by Defendant's release further warrant Defendant's detention pending trial.
4. Specifically, Defendant and his accomplices carjacked a Domino's pizza delivery driver's

Dodge Charger, brandishing a firearm while doing so. They then fled to Illinois. The victim's phone was still in the Charger, logged into the Domino's delivery app. Because of location data from the victim's phone, investigators located the Charger shortly after the carjacking. Defendant was driving the carjacked Charger. He fled from police officers, eventually wrecking the Charger after trying to avoid spike strips. Defendant's actions show a danger to the community (he carjacked someone just doing their job, and then imperiled others fleeing from police). Moreover, Defendant's actions show a risk of flight. When faced with apprehension by law enforcement, he was willing to do whatever it took to escape.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

s/ Cassandra J. Wiemken
Cassandra J. Wiemken, #91586KY
Assistant United States Attorney